

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

)	
In re:)	Chapter 11
)	
TMST, INC., f/k/a)	Case Nos. 09-17787 (NVA)
THORNBURG MORTGAGE, INC., <i>et al.</i> , ¹)	09-17790 through 17792 (NVA)
)	
Debtors.)	(Jointly Administered)

**NOTICE OF CHAPTER 11 TRUSTEE’S
EIGHTH OMNIBUS OBJECTION TO PROOFS OF CLAIM
(UNSUBSTANTIATED VENDOR CLAIMS)**

PLEASE TAKE NOTICE that on September 28, 2022, Joel I. Sher, Chapter 11 Trustee (the “Trustee”) for (i) TMST, Inc. f/k/a Thornburg Mortgage, Inc. (“TMST”), (ii) TMST Acquisition Subsidiary, Inc. f/k/a Thornburg Acquisition Subsidiary, Inc. (“TMAS”), (iii) TMST Home Loans, Inc. f/k/a Thornburg Mortgage Home Loans, Inc. (“TMHL”), and (iv) TMST Hedging Strategies, Inc. f/k/a Thornburg Mortgage Hedging Strategies, Inc. (“TMHS”) (collectively, the “Debtors”), by and through undersigned counsel, filed his Eighth Omnibus Objection to Proofs of Claim (Unsubstantiated Vendor Claims) (the “Objection”)². The Objection is appended to this Notice.

PLEASE TAKE FURTHER NOTICE that you have filed a claim, as shown on Exhibit A to the Objection, in the Debtors’ chapter 11 cases to which the Trustee has filed the Objection. **YOUR CLAIMS MAY BE DISALLOWED, EXPUNGED, SUBORDINATED OR OTHERWISE AFFECTED AS A RESULT OF THE OBJECTION. THEREFORE, YOU SHOULD READ THIS OBJECTION NOTICE AND THE OBJECTION CAREFULLY.**

Procedures for Responding to the Claim Objection

To contest the Objection, you must file and serve a written response to the Objection within thirty (30) days of the date of this Notice so that it is received no later than **4:00 p.m. ET**,

¹ The Debtors in these jointly administered Chapter 11 cases are: (i) TMST, Inc., f/k/a Thornburg Mortgage, Inc., (Case No. 09-17787); (ii) TMST Acquisition Subsidiary, Inc., f/k/a Thornburg Acquisition Subsidiary, Inc. (Case No. 09-17790); (iii) TMST Home Loans, Inc., f/k/a Thornburg Mortgage Home Loans, Inc. (Case No. 09-17791); and (iv) TMST Hedging Strategies, Inc., f/k/a Thornburg Mortgage Hedging Strategies, Inc (Case No. 09-17792).

² All capitalized terms used but otherwise not defined herein shall have the meanings set forth in the Objection.

on October 28, 2022. The response must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Maryland (the “Clerk”) at the following address:

Clerk, United States Bankruptcy Court for the
District of Maryland
Garmatz Federal Courthouse
101 West Lombard Street
Suite 8530
Baltimore, MD 21201

You must also serve the Response upon the following counsel to the Trustee on or before the response deadline:

Joel I. Sher, Esquire (Fed. Bar No. 00719)
SHAPIRO SHER GUINOT & SANDLER
250 W. Pratt Street, Suite 2000
Baltimore, Maryland 21201
Telephone: (410) 385-4277
Facsimile: (410) 539-7611
Email: jis@shapirosher.com

Any such response to this Objection must contain, at a minimum, the following:

1. A caption setting forth the name of the Court, the name of the Debtors, the case number, and the title of the Objection to which the response is directed;
2. Your name, your claim number, and a description of the basis for the amount of the claim;
3. The specific factual basis and supporting legal argument upon which the party will rely in opposing the Objection;
4. Any supporting documentation, to the extent it was not included with the proof of claim previously filed, upon which the party will rely to support the basis for and amounts asserted in the proof(s) of claim;
5. The name, address, telephone number, and email address of the person(s) (which may be you or your legal representative) with whom counsel for the Trustee should communicate with respect to the claim or the objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the disputed claim(s) on behalf of the claimant(s).

If you fail to file and serve a timely response, the Trustee may present to the Court an appropriate order disallowing and expunging your claim without further notice to you or a hearing.

Additional Information

PLEASE TAKE FURTHER NOTICE that questions regarding the amount of your Claim as set forth above and legal questions should be directed to Joel I. Sher, Esquire at SHAPIRO SHER GUINOT & SANDLER, the Trustee's counsel, by (i) emailing jis@shapirosher.com, respectively, or (ii) calling 410-385-4277. Please have your proof(s) of claim and any related material available for any such discussions.

PLEASE TAKE FURTHER NOTICE that nothing in this Notice or the accompanying Objection is or shall be deemed to constitute a waiver of any rights of the Trustee (a) to dispute any claims, (b) to assert counterclaims, rights of offset or recoupment, or defenses to any claims, (c) to object to claims (or other claims or causes of action of a claimant or to claims on the Debtors' schedules) on any grounds, unless the Court has allowed a claim or ordered otherwise, or (d) to seek to estimate any claim at a later date. The Trustee reserves the right to assert additional objections to your proof(s) of claim.

Dated: September 28, 2022

/s/ Joel I. Sher

Joel I. Sher, Bar No. 00719
Richard M. Goldberg, Bar No. 07994
Daniel J. Zeller, Bar No. 28107
Anastasia L. McCusker, Bar No. 29533
SHAPIRO SHER GUINOT & SANDLER
250 W. Pratt Street, Suite 2000
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*Counsel for Joel I. Sher, Chapter 11 Trustee
for TMST, Inc., et. al.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of September, 2022, a copy of the *Objection*,

Notice and Proposed Order was served on the parties listed below by first class mail:

Bowne Of Dallas, LP
Attn: Assistant Controller
1931 Market Center Blvd
Ste III
Dallas, TX 75207
Notice address and signatory per Claim No. 756

Dell, Inc.
Attn: Michael Keller, Sr. Credit Manager
One Dell Way, RR1, MS 52
Round Rock, TX 78682
Notice address and signatory per Claim No. 290

GA Kraut Company Inc
485 Madison Avenue
4th Floor
New York, NY 10022
Notice address per Claim No. 172

Gartner Inc.
12600 Gateway Blvd.
Fort Myers, FL 33913
Notice address per Claim No. 49

Geo Learning, Inc.
Attn: Allison Wallace, Senior Counsel
4600 Westown Pkwy
Suite 301
West Des Moines, IA 50266
Notice address and signatory per Claim No. 1102

Knowledgeadvisors, Inc.
Attn: Barbara Kandemir
222 S. Riverside Dr. Ste. 2050
Chicago, Il 60606
Notice address and person per Claim No. 68

Kroll Factual Data

Attn: Cindy Bartlett, Credit Manager

5200 Hahns Peak Drive

Loveland, CO 80538

Notice address and signatory per Claim No. 446

Payzero Mortgage, Inc.

C/O Shopping.Com Corporation

Attn: George Richardson, III

1133 SE 4th Avenue

Fort Lauderdale, FL 33316

Notice address and signatory per Claim No. 87

Qwest Communications Company, LLC

Attn: Jane Frey

1801 California St, Room 900

Denver, CO 80202-2658

Notice address and person per Claim No. 352

Qwest Corporation

Attn: Jane Frey

1801 California St, Rm 900

Denver, CO 80202-2658

Notice address and person per Claim No. 351

Wolfe & Wyman LLP

5 Park Plaza, Suite 1100

Irvine, CA 92614-5979

Notice address per Claim No. 938

Worldwide Express

Attn: Melissa Freeman, Director of Admin.

PO Box 36070

Birmingham, AL 35236

Notice address and signatory per Claim No. 159

/s/ Joel I. Sher

Joel I. Sher